UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE

MAXIM HEALTHCARE STAFFING)	
SERVICES, INC.,)	
Plaintiff,)	
v.) Case No. 3:23-cv-00018	
) Judge Aleta A. Trauger	
TEHUM CARE SERVICES, INC.)	
F/K/A CORIZON HEALTH, INC.;)	
CHS TX, INC.; and YESCARE CORP.,)	
)	
Defendants.)	

UNOPPOSED MOTION TO EXTEND DEADLNE TO FILE RESPONSIVE PLEADING

Undersigned counsel for Defendants CHS TX, Inc. and YesCare Corp. (collectively, "Defendants") hereby moves the Court for an extension to respond to the Complaint until and including **February 28, 2023.** Undersigned counsel has consulted with counsel for Plaintiff, and there is no opposition to this request.

In support hereof, undersigned counsel states that additional time is appropriate to complete investigation of Plaintiff's allegations and prepare Defendants' response to the Complaint. The requested extension will not prejudice any party or unduly delay the disposition of this matter, and Plaintiff does not oppose the extension.

Respectfully submitted,

s/ W. Travis Parham

W. Travis Parham (TN BPR #016846) Andrew A. Warth (TN BPR #027606) Karolyn G. Perry (TN BPR #036900) WALLER LANSDEN DORTCH & DAVIS, LLP 511 Union Street, Suite 2700 Nashville, Tennessee 37219 Tel.: (615) 244-6380 Travis.Parham@wallerlaw.com Drew.Warth@wallerlaw.com Karolyn.Perry@wallerlaw.com

Counsel for Defendants YesCare Corp. and CHS TX, Inc.

CERTIFICATE OF SERVICE

I hereby certify that, on February 13, 2023, a copy of the foregoing document was filed electronically via the court's CM/ECF system, which will serve counsel below as indicated on the court's notice of electronic filing.

Erno D. Lindner Baker, Donelson, Bearman, Caldwell & Berkowitz, PC 633 Chestnut Street, Suite 1900 Chattanooga, TN 37450 elindner@bakerdonelson.com

Attorney for the Plaintiff, Maxim Healthcare Staffing Services, Inc.

Russell B. Morgan **Bradley Arant Boult Cummings LLP** 1600 Division Street, Suite 700 P.O. Box 340025 Nashville, TN 37203 rmorgan@bradley.com

Counsel for Defendant Tehum Care Services, Inc. f/k/a Corizon Health, Inc.

s/ W. Travis Parham